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*Kelly Toys Holdings, LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KELLY TOYS HOLDINGS, LLC,

*Plaintiff*

v.

ALIALIALILL STORE, BABY -SHOPPING  
STORE, BAZINGA STORE, BBOTTRUOYS  
TOY STORE, BOBONIU STORE,  
CHENWANJU STORE, CHILDREN  
GROWING TREE STORE, CHINESE  
PLUSH TOY STORE, DONGGUAN  
SHENGEN HARDWARE PLASTIC CO.,  
LTD., DONGGUAN WOODFIELD BABY  
PRODUCTS COMPANY LIMITED,  
DONGGUAN XINGKE GIFT CO., LTD.,  
DROPSHIPPING-TOYS STORE,  
FAIRYLANDS TOY STORE, FCOT STORE,  
FOURTRY STORE, FRANCIS 001 STORE,  
FUN GAME FUN STORE, GUANGDONG  
SANSAN SUPPLY CHAIN CO., LTD.,  
GUANGZHOU LITTLE TALENT TOYS  
CO., LTD., GUANGZHOU YIMAI  
TRADING CO., LTD., HANGZHOU  
AGREAT IMPORT & EXPORT CO., LTD.,  
HEBEI KUNI ANIMATION INDUSTRY  
CO., LTD., HENAN YINGHUOZHIGUANG  
CULTURE MEDIA CO., LTD.,  
MIKECRACK STORE, MONSTER JELLIE  
CULTURE CO., LTD., MOVING

**CIVIL ACTION No.**  
**21-cv-8434 (AJN)**

DREAMING STORE, NANJING  
 RUIFUTONG ARTS AND TOYS  
 MANUFACTURING CO., LTD., QWJA  
 STORE, SHANGHAI QIANJIU TRADING  
 CO., LTD., SHENZHEN TONGFEI  
 INTERNATIONAL TRADE CO., LTD.,  
 SHENZHEN HECHUN TECHNOLOGY  
 CO., LTD., SHENZHEN QINGHONG TOYS  
 CO., LTD., SHOP5477120 STORE,  
 SHOP910893006 STORE, SI TING STORE,  
 SZ GTEAK TECHNOLOGY CO., LIMITED,  
 TC XRC STORE STORE, TIKTOK IP  
 STORE, VL STORE, XINXIANG PURUIGE  
 IMPORT AND EXPORT TRADING CO.,  
 LTD., YAMONG STORE, YANGZHOU  
 AIXINI INTERNATIONAL TRADE  
 IMPORT AND EXPORT CO., LTD.,  
 YANGZHOU AORUNJU GIFTS CO., LTD.,  
 YANGZHOU BABYJOY ARTS & CRAFTS  
 CO., LTD., YANGZHOU CUTESHOOT  
 PLUSHIES CO., LTD., YANGZHOU  
 DULALA CRAFTS LTD., YANGZHOU  
 KINGSTONE TOYS CO., LTD.,  
 YANGZHOU MARISA TOY GIFTS CO.,  
 LTD., YANGZHOU SCS HOMETEXTILE  
 CO., LTD., YANGZHOU WEIHU  
 HANDICRAFT CO., LTD., YANGZHOU  
 WOSEN TOYS CO., LTD., YIWU  
 CHUANYU IMPORT AND EXPORT FIRM,  
 YIWU DUOTONG E-COMMERCE CO.,  
 LTD., YIWU FUGUAN HOUSEHOLD  
 SUPPLIES CO., LTD., YIWU HAIPING  
 BAG FACTORY, YIWU QUANFA IMPORT  
 & EXPORT COMPANY LIMITED, YIWU  
 VICTORY IMPORT & EXPORT CO., LTD.,  
 YIWU XINTU IMPORT AND EXPORT CO.,  
 LTD., YIWU YINWEI HOUSEHOLD  
 PRODUCTS CO., LTD., YIWU ZHENGZHI  
 QIN TRADING FIRM and ZHANJIANG  
 DYNAMIC POINT NETWORK  
 TECHNOLOGY CO., LTD.,

*Defendants*

**NOTICE OF MOTION FOR DEFAULT JUDGMENT AND**  
**A PERMANENT INJUNCTION**

PLEASE TAKE NOTICE THAT, that in accordance with the Court's Individual Local Rule 55.2(b) and Federal Rules of Civil Procedure 55(b)(2), Plaintiff, by and through its undersigned counsel, moves for default judgment and a permanent injunction against the following Defendants: alialialiLL Store, baby -shopping Store, Bazinga Store, BBOTTRUOYS Toy Store, boboni Store, chenwanju Store, Children Growing Tree Store, Chinese Plush Toy Store, Dongguan Shengen Hardware Plastic Co., Ltd., Dongguan Woodfield Baby Products Company Limited, Dongguan Xingke Gift Co., Ltd., Dropshipping-Toys Store, Fairylands Toy Store, FCOT Store, Fourtry Store, Francis 001 Store, Fun Game Fun Store, Guangdong Sansan Supply Chain Co., Ltd., Guangzhou Little Talent Toys Co., Ltd., Guangzhou Yimai Trading Co., Ltd., Hangzhou Agreat Import & Export Co., Ltd., Hebei Kuni Animation Industry Co., Ltd., Henan Yinghuozhiguang Culture Media Co., Ltd., Mikecrack Store, Monster Jellie Culture Co., Ltd., Nanjing Ruifutong Arts And Toys Manufacturing Co., Ltd., QWJA Store, Shanghai Qianjiu Trading Co., Ltd., Shenzhen Tongfei International Trade Co., Ltd., Shenzhen Hechun Technology Co., Ltd., Shenzhen Qinghong Toys Co., Ltd., Shop5477120 Store, Shop910893006 Store, SI TING Store, SZ Gteak Technology Co., Limited, TC XRC Store Store, TIKTOK IP Store, VL Store, Xinxiang Puruige Import And Export Trading Co., Ltd., YaMong Store, Yangzhou Aixini International Trade Import And Export Co., Ltd., Yangzhou Aorunju Gifts Co., Ltd., Yangzhou Babyjoy Arts & Crafts Co., Ltd., Yangzhou Cuteshoot Plushies Co., Ltd., Yangzhou Dulala Crafts Ltd., Yangzhou Kingstone Toys Co., Ltd., Yangzhou Marisa Toy Gifts Co., Ltd., Yangzhou SCS Hometextile Co., Ltd., Yangzhou Wosen Toys Co., Ltd., Yiwu Chuanyu Import And Export Firm, Yiwu Duotong E-Commerce Co., Ltd., Yiwu Fuguan Household Supplies Co., Ltd., Yiwu Haiping Bag Factory,

Yiwu Quanfa Import & Export Company Limited, Yiwu Victory Import & Export Co., Ltd. and  
Yiwu Xintu Import And Export Co., Ltd. (“Defaulting Defendants”).

Dated: March 11, 2022

Respectfully submitted,

EPSTEIN DRANGEL LLP

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